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9
10 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 ERIN ALLEN, an Individual,
12
13 Plaintiff,

14 vs.

15 VOCATUS, LLC, a Nevada Limited
Liability Company; SHAMOUN’S, LLC, a
16 Nevada Limited Liability Company, DOES
1-50, inclusive and ROE CORPORATIONS
17 1-50, inclusive,

18 Defendant.

CASE NO.: 2:21-cv-00377-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF ERIN
ALLEN TO FILE RESPONSE TO
DEFENDANTS’ MOTION FOR
SUMMARY JUDGMENT**

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20 Plaintiff Erin Allen (“Allen”), and Defendants Vocatus, LLC and Shamoun’s, LLC
21 (together “Defendants”), by and through their respective attorneys of record, stipulate as
22 follows:

23 1. On May 4, 2022, Defendants filed their Motion for Summary Judgment. [ECF
24 No. 35].

25 2. On May 25, 2022, Plaintiff, through her prior counsel, filed a Motion to Extend
26 Time to Respond to Motion for Summary Judgment [ECF No. 36], to which Defendants
27 responded the same day. [ECF No. 37].

28 **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF ERIN ALLEN TO FILE RESPONSE
TO DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

1 3. On May 31, 2022, Plaintiff's prior counsel, Trevor Hatfield, Esq., moved to
2 withdraw as counsel for Plaintiff. [ECF No. 38].

3 4. On June 2, 2022, Defendants filed their response to the motion to withdraw.
4 [ECF No. 40].

5 5. On June 3, 2022, this Court denied Mr. Hatfield's motion to withdraw as
6 Plaintiff's counsel without prejudice and permitted Mr. Hatfield until June 17, 2022, to file a
7 corrected motion to withdraw. [ECF No. 41].

8 6. On June 16, 2022, Mr. Hatfield filed a renewed motion to withdraw as counsel
9 for Plaintiff. [ECF No. 42].

10 7. Defendants filed their notice of non-opposition to the motion to withdraw on
11 June 20, 2022. [ECF No. 43].

12 8. On June 28, 2022, this Court granted Plaintiff's prior counsel's motion to
13 withdraw and ordered that Plaintiff: (1) shall have until July 13, 2022, to retain new counsel or
14 inform the Court whether she will proceed pro se; and (2) shall have until August 3, 2022, to
15 respond to Defendants' Motion for Summary Judgment. [ECF No. 44].

16 9. On July 18, 2022, Plaintiff's new counsel of record, HKM Employment
17 Attorneys LLP, appeared on Plaintiff's behalf. [ECF No. 45].

18 10. On July 28, 2022, Plaintiff's new counsel, HKM Employment Attorneys LLP,
19 received Plaintiff's file from her prior counsel.

20 11. The parties hereby stipulate and agree Plaintiff shall have fourteen (14)
21 additional days to file her response to Defendants' Motion for Summary Judgment. The new
22 deadline for Plaintiff to file her response shall be August 17, 2022.

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12. This is the second request for an extension of this deadline and is not made for purposes of undue delay.

Dated: August 1, 2022.

HKM EMPLOYMENT ATTORNEYS, LLP

**OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.**

/s/ Jenny L. Foley

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Attorneys for Defendants Vocatus, LLC and

Shamoun's, LLC

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT COURT JUDGE
CASE NO.: 2:21-cv-00377-APG-DJA

DATED: August 2, 2022

**STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF ERIN ALLEN TO FILE RESPONSE
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**